

**FILED
UNDER
SEAL**

Prob12C
D/NV Form
Rev. March 2017

United States District Court
for
the District of Nevada

PETITION FOR WARRANT/SUMMONS
FOR OFFENDER UNDER SUPERVISION

Name of Offender: **Steven Lavern Lawrence, Sr.**

Case Number: **2:18CR00271**

Name of Sentencing Judicial Officer: **Honorable Richard F. Boulware**

Date of Original Sentence: **June 14, 2019**

Original Offense: **Wire Fraud**

Original Sentence: **36 Months probation**

Date Supervision Commenced: **June 14, 2019**

Name of Assigned Judicial Officer: **Honorable Richard F. Boulware**

PETITIONING THE COURT

☒ To issue a summons:

The probation officer believes the offender has violated the following condition(s) of supervision:

1. Do Not Commit Another Crime - You must not commit another federal, state or local crime.

- A. On or about February 16, 2021, Lawrence committed the crime of Theft, in violation of N.R.S. 205.0832.

On or about February 16, 2021, Lawrence obtained a Tesla Model Y by a material misrepresentation with the intent to deprive Tesla of the vehicle. In the acquisition of the vehicle, Lawrence submitted to Tesla a fictitious wire confirmation receipt and a fictitious bank statement representing that a wire transfer in the amount of \$58,866.04 was transmitted from his personal bank account with USAA Bank to

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Tesla on February 16, 2021 for the full purchase price of the Tesla vehicle. Based on this misrepresentation Tesla delivered a Tesla Model Y to Lawrence. At no time did Lawrence have \$58,866.04 to purchase this vehicle, nor did he wire any monies to Tesla for the purchase of the vehicle.

On April 28, 2021, Lawrence admitted to the undersigned and Supervisory United States Probation Officer (SUSPO) Todd Fredlund that he prepared the fictitious documents and submitted them to Tesla for the acquisition of the vehicle.

- B. On or about July 6, 2020, Lawrence committed the crime of Offering False Instrument for Filing or Record, in violation of N.R.S. 239.330.

Lawrence, under penalty of perjury, filed an Application of Appointment as a Notary Public with the Nevada Secretary of State on or about July 6, 2020. Lawrence falsified this instrument by answering no to the question “Have you ever been convicted of a crime of moral turpitude?”

Pursuant to N.R.S. 240.010A, Appointment by Secretary of State; cancellation of appointment; unlawful acts, states in part the Secretary of State shall not appoint as a notary a person who has been convicted of a crime involving moral turpitude or other offenses to include Burglary, Embezzlement, Forgery, Fraud, Identity Theft, Larceny, Obtaining Money Under False Pretense, or any other crime involving misappropriation of the identity of property of another person or entity.

Lawrence’s conviction of Wire Fraud precludes him from serving as Notary Public in the State of Nevada.

2. Be Truthful – You must answer truthfully the questions asked by the probation officer.

- A. On March 26, 2021, with knowledge of the penalties for false statements provided under 18 U.S.C. § 1001, Lawrence executed a Declaration of Offender Net Worth and Cash Flow statement. failed to answer this financial inquiry truthfully by not disclosing bank accounts, registered vehicles, and business holdings. Specifically, Mr. Lawrence failed to disclose the following financial information:
1. The Declaration of Offender Net Worth and Cash Flow statement requires all business holdings in which one has an ownership interest, or if there was an affiliation within the last three years; e.g., self-employed, sole proprietor, officer,

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shareholders, board member, partner, associate, etc. to be reported to the Probation Office. Lawrence failed to report Digital Mayhem LLC. A business entity search revealed that Lawrence is the registered agent and manager. In addition, Lawrence failed to report his ownership of Tech Leaders International.

2. The Declaration of Offender Net Worth and Cash Flow statement requires all personal and business checking and saving accounts, credit unions, money markets, etc. to be reported to the Probation Office. Lawrence reported one Chase joint checking account ending in 0761 and one USAA joint checking account ending in 0498. It was subsequently learned that Lawrence additionally has a USAA joint checking account ending 1082, USAA joint savings account ending in 8309, and a Chase checking account ending in 5172.
3. The Declaration of Offender Net Worth and Cash Flow statement requires cars, trucks, mobile, homes, motorcycles, all-terrain vehicles, etc, that one has under their possession to be reported to the Probation Office.

A DMV Vehicle records check showed Lawrence as the owner of a 2021 Model Y Tesla Automobile and a 2017 CBR500 Honda Motorcycle. Lawrence failed to report the ownership of these vehicles to the probation office.

- B. At onset of supervision, Lawrence was instructed by his probation officer to submit a truthful and complete written report within the first five days of each month. Lawrence failed to submit truthful written reports by failing to disclose the following information:

1. Monthly supervision reports require individuals under supervision to list all expenditures over \$500, including goods and services, that were purchased during the reported month.

On February 16, 2021, Lawrence purchased a 2021 Model Y Tesla Automobile and failed to report the purchase on his February 2021 monthly supervision report.

In June 2020, Lawrence purchased a 2020 Jeep Grand Cherokee Limit and a 2020 Jeep Compass Latitude and failed to report the purchases on his June 2020 monthly supervision report.

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On January 10, 2020, Mr. Lawrence purchased a 2017 CBR500 Honda Motorcycle and failed to report the purchase on his January 2020 monthly supervision report.

2. Monthly supervision reports also require individuals under supervision to disclose all registered vehicles.

A DMV Vehicle records check showed Lawrence as the owner of vehicles not reported on his monthly reports. Lawrence failed to report his 2020 Jeep Grand Cherokee Limit and 2020 Jeep Compass Latitude on monthly supervision reports submitted between July 2020 and February 2021.

Lawrence failed to report his 2017 CBR500 Honda Motorcycle on monthly supervision reports submitted between December 2020 and March 2021.

Lawrence failed to report the 2021 Model Y Tesla Automobile on his February 2021 monthly supervision report.

3. Monthly supervision reports require individuals under supervision to list employment and monthly cash inflows (i.e., net earnings from employment, tips, etc.).

Lawrence failed to report his employment as a notary and his net earnings from his employment as a notary on monthly supervision reports submitted between July 2020 and February 2021. Upon review of the provided bank statements, between September 10, 2020 and March 4, 2020, Lawrence earned \$14,153.15 as a notary.

Lawrence failed to report net earnings from employment through the Turo car sharing app on the March 2021 monthly supervision report.

4. Monthly supervision reports require individuals under supervision to list all checking and/or savings account that they own. Lawrence failed to report the following accounts on his monthly reports: a USAA joint checking account ending in 1082, USAA joint savings account ending in 8309, and a Chase checking account ending in 5172.

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- C. On April 15, 2021, Lawrence was questioned by the undersigned and Supervisory United States Probation Officer (SUSPO) Todd Fredlund about the acquisition of a Tesla. Specifically, Lawrence was asked how he obtained the vehicle. Lawrence failed to answer this inquiry truthfully. Lawrence stated he won the vehicle in a contest that he was randomly entered in. Lawrence went on to explain that he conducts online reviews of various tech products and through this was entered in a contest to win a Tesla. Lawrence further explained he became suspicious of how he received the vehicle and surrendered the vehicle to Tesla approximately two weeks ago.

On April 19, 2021, Tesla Security verified that Lawrence did not win the vehicle but acquired the 2021 Model Y Tesla on or about February 16, 2021 through fraudulent means by providing Tesla with a fictitious wire confirmation receipt and a fictitious bank statement showing \$58,766.04 was wired from his bank account to Tesla for the full purchase amount of the vehicle. Tesla Security further confirmed Lawrence did not return the vehicle to Tesla until April 15, 2021, immediately after leaving the probation office that date.

- D. On April 15, 2021, Lawrence lied to the probation officer, stating that he had no connection to any business named "Tech Leaders International"

On April 7, 2021, Detective Sean Pullar with the Las Vegas Metropolitan Police Department fraud unit contacted the undersigned to inform that he is investigating a forgery wherein Lawrence has been identified as the suspect. It is suspected Lawrence altered/forged a check in the amount of \$10,000. Investigation revealed the victim issued a check to Lawrence on June 18, 2020 in the amount of \$30 for notary services provided by Lawrence. This same check was subsequently altered and made payable to Tech Leaders International in the amount of \$10,000 dated March 2, 2021 and deposited into an unknown account with USAA bank on March 5, 2021.

On April 15, 2021, during an office visit, Lawrence was asked by the undersigned and SUSPO Fredlund if has any knowledge or connection to Tech Leaders International. Lawrence adamantly denied any knowledge or connection to Tech Leaders International. Lawrence did acknowledge receiving the \$30 check from the victim in June 2020.

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On April 19, 2021, officers of the United States Probation Office executed a search of the Lawrence's residence and recovered a Chase Bank business debit card bearing the name of "Steven Lawrence- Tech Leaders International and a torn Chase Bank statement bearing name "Tech Leaders International".

When confronted with the above-noted items, Lawrence admitted to SUSPO Fredlund that he created the business Tech Leaders International and opened an account in the business name with Chase Bank.

3. You must make restitution in accordance with 18 U.S.C. §§ 2248, 2259, 2264, 2327, 3663, 3663A, and 3664. (Probation cases only)

On December 4, 2019, Mr. Lawrence signed a payment agreement to begin making payments in the amount of \$200 each month starting on December 4, 2019, with subsequent payments due monthly until paid in full.

Since May 5, 2020, Lawrence has made \$50 monthly payments totaling \$700 towards his \$406,726.00 restitution.

4. Access to Financial Information – You must provide the probation officer access to any requested financial information and authorize the release of any financial information. The probation office will share financial information with the U.S. Attorney's Office.

On April 21, 2021, Lawrence was instructed to produce the Articles of Organization, Fictitious Firm Name Registration, and any other business documents associated with Tech Leaders International LLC. Lawrence has failed to produce these documents.

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U.S. Probation Officer Recommendation:

The term of supervision should be:

☒ Revoke

I declare under penalty of perjury that the
information contained herein is true and correct,

Executed on May 14, 2021

Digitally signed by



Gabriella Mitchell

Date: 2021.05.14

13:36:51 -07'00'

Gabriella Mitchell

United States Probation Officer Assistant

Approved:



Digitally signed by Todd
Fredlund

Date: 2021.05.14 13:30:00
-07'00'

Todd J. Fredlund

Supervisory United States Probation Officer

THE COURT ORDERS

- ☐ No Action.
☒ The issuance of a warrant.
☐ The issuance of a summons.
☐ Other:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

May 14, 2021
Date